

REMARKS/ARGUMENTS

This paper is in response to the non-final Office action mailed January 18, 2006. Claims 25 and 27 were pending in the application. By this amendment, claims 25 and 27 are amended and claims 28-48 are new. Support for the amendment to claims 25 and 27 and the new claims may be found in the specification and claims as originally filed. No new matter is added. As a result, claims 25 and 27-48 are pending and at issue.

Objection to the Drawings

The applicants respectfully traverse the objection to the drawings. The second ply 38 includes both an attachment tab 54 and a closure tab 76. *See* Fig. 6. Support in the specification may be found in paragraphs [0011], where the second ply 38 includes an attachment tab, and paragraph [0013], where the second ply 38 also includes a closure tab 76. As a result, the drawings show both a first and second tab attached to the second ply. Thus, the applicants respectfully request withdrawal of the objection to the drawings.

Objection to the Specification

The applicants respectfully traverse the objection to the specification. As discussed above, Fig. 6 and paragraphs [0011] through [0013] show a second ply 38 that includes a first tab (attachment tab 54) and a second tab (closure tab 76). Thus, the specification provides proper antecedent basis for the terms in claims 25 and 27. The applicants respectfully request withdrawal of the objection to the specification.

35 U.S.C. § 112 Rejections

The applicants respectfully traverse the rejection of claims 25 and 27 as indefinite. As discussed above, the second ply includes a first and second tab as shown in paragraphs [0011] through [0013] and Fig. 6. Thus, claims 25 and 27 are not indefinite. The applicants respectfully request withdrawal of the rejection of claims 25 and 27.

35 U.S.C. § 103 Rejections

The applicants respectfully traverse the rejection of claims 25 and 27 as allegedly being obvious over any combination of U.S. Patent No. 5,421,665 to Strassberg ("Strassberg") in view of either U.S. Patent No. 6,349,491 to Able ("Able") or U.S. Patent No. 6,349,491 to Westberg ("Westberg"). "To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art." The

cited art fails to disclose a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply and the first ply being disposed between the first surface of the flexible substrate and a second ply.

Strassberg fails to disclose or suggest a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply, and the first ply being disposed between the first surface of the flexible substrate and a second ply. Specifically, Strassberg discloses a flip chart card file having a flat base 10 and a plurality of card holders 16, 17 attached thereto (col. 2, lines 26-50 and Figs. 1 and 6). The official action identifies the back surface of the substrate in Fig. 6 as the second surface and the front surface of the substrate in Fig. 6 as the first surface (official action, page 4). Furthermore, the official action identifies portion 57 as the second ply (official action, page 4, See also Fig. 6 of Strassberg). As a result, the second ply of Strassberg is disposed between the first surface and the first ply (See Fig. 6). This stands in opposition to claims 25 and 27 which recite a first ply being disposed between the first surface and the second ply.

Furthermore, claims 25 and 27 recite the first ply remaining substantially parallel to the flexible substrate. By contrast, the Strassberg device arranges the first ply at an angle to the flat base 10. For this additional reason, Strassberg fails to disclose each and every element in claims 25 and 27.

Able fails to correct the deficiency of Strassberg by failing to disclose or suggest a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply, and the first ply being disposed between the first surface of the flexible substrate and a second ply. Specifically, while Able discloses a card display including a base 12 and a plurality of sections 14, the sections are joined to the base 12 via welds 38, 44, 46, 48 (col. 6, lines 33-40, see also Fig. 1) at a front surface of the base 12. This front surface must be the second surface (each of claims 25 and 27 recite the first and second plies being attached to the second surface), and the back of the base 12 must be the first surface. Thus, the first surface is not and cannot be disposed between the second surface and a first ply. Because neither Strassberg nor Able disclose or suggest a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply and the first ply being disposed between the first surface of the flexible substrate and a second ply as is recited in each of claims 25 and 27, neither claim 25 nor claim 27 can be rendered obvious by any

combination of Strassberg and Able. Accordingly, the applicants respectfully request withdrawal of the rejection of claims 25 and 27.

Likewise, Westberg also fails to correct the deficiency of Strassberg by failing to disclose or suggest a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply, and the first ply being disposed between the first surface of the flexible substrate and a second ply. Specifically, while Westberg discloses a posting device having mounting panel 1 with transparent elements 2, 3 fastened thereto, the transparent elements 2, 3 are joined to a front surface of the mounting panel 1 (Fig. 2) via an outer surface of a non-protruding wall 5 (Fig. 2 and col. 5, lines 6-17). Thus, like Able, this front surface is the second surface (each of claims 25 and 27 recite the first and second plies being attached to the second surface), and the back of the mounting panel 1 must be the first surface. As a result, the first surface is not and cannot be disposed between the second surface and a first ply, as seen in Fig. 2. Because neither Strassberg nor Westberg disclose or suggest a first surface of a flexible substrate disposed between a second surface of the flexible substrate and a first ply, and the first ply being disposed between the first surface of the flexible substrate and a second ply, as is recited in each of claims 25 and 27, neither claim 25 nor claim 27 can be rendered obvious by any combination of Strassberg and Westberg. Accordingly, the applicants respectfully request withdrawal of the rejection of claims 25 and 27.

New Claims 28-48

New claims 28-48 are distinguishable over the cited art for the reasons stated above with respect to claims 25 and 27. Specifically, none of the cited art discloses or suggests a first surface disposed between a second surface and a first ply, and the first ply being disposed between the first surface and the second ply. Thus, the applicants respectfully submit that new claims 28-48 are in allowable form.

Conclusion

For the foregoing reasons, reconsideration and withdrawal of the rejections of the claims and allowance thereof is respectfully requested. Should the examiner wish to discuss the foregoing, or any matter of form, in an effort to advance this application towards allowance, the examiner is urged to telephone the undersigned at the indicated number. No fees are believed due as the applicants originally paid for examination of 27 claims with the

original application and the addition of new claims 28-48 only brings the total pending claims to 23. However, if any fees are due, the Director is authorized to debit Deposit Account No. 13-2855 of Marshall, Gerstein & Borun LLP. A copy of this paper is enclosed herewith.

Respectfully submitted,

MARSHALL, GERSTEIN & BORUN LLP

By: 

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Michael A. Chinlund
Reg. No. 55,064
Agent for Applicants
6300 Sears Tower
233 South Wacker Drive
Chicago, Illinois 60606-6357
(312) 474-6300